

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

**IN RE: TERESA BATTLE  
DEBTOR(S)**

**CASE NO.: 14-04412-5-SWH  
CHAPTER 13**

**NOTICE OF MOTION TO MODIFY PLAN**

NOTICE IS HEREBY GIVEN of Motion To Modify Chapter 13 Plan filed simultaneously herewith by attorney, ALLEN C. BROWN in the above captioned case;

FURTHER NOTICE IS HEREBY GIVEN that if you fail to respond or otherwise plead or request a hearing, in writing, by January 4, 2015, the relief requested in the Motion may be granted without further hearing or notice; and

FURTHER NOTICE IS GIVEN that if a response and request for a hearing is filed by the creditors, trustee, or other parties in interest named herein in writing within the time indicated, a hearing will be conducted on the Motion and response thereto, at a date, time and place to be later set by this Court and all interested parties will be notified accordingly.

DATED: December 9, 2015

BY:/s/Allen C. Brown  
Allen C. Brown  
Attorney for Debtor(s)  
3493-C S. Evans St.  
Bedford Commons  
Greenville, NC 27835  
PO BOX 1909  
Winterville, NC 28590  
(252) 752-0952  
State Bar #: 12131

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**MOTION TO MODIFY CHAPTER 13 PLAN**

NOW COMES, the debtor, by and through counsel, petitioning the court to modify her plan in the following terms:

This plan requires a modification because the debtor is getting a reverse mortgage on her residence and this will pay the mortgage off in full and the mortgage will be removed from the debtor's plan. The new plan will be \$1305.00 for 15 months; and then \$1000.00 for 45 months.

WHEREFORE, the debtor moves this honorable court, to enter an order confirming the debtor's modified Chapter 13 plan.

December 9, 2015

BY:/s/Allen C. Brown  
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Attorney for Debtor(s)  
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Greenville, NC 27835  
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(252) 752-0952  
State Bar #: 12131

CERTIFICATE OF SERVICE

I, ALLEN C. BROWN, attorney for the Debtor certify:

1. That I am at all times hereinafter mentioned more than eighteen (18) years of age.
2. That on the 9<sup>TH</sup> day of December, 2015, I served copies of the foregoing: Motion To Modify on the following:

Richard M. Stearns  
Chapter 13 Trustee  
Via Electronic Filing

United States Bankruptcy Court  
Via Electronic Filing

Teresa Battle  
211 Adams Blvd  
Greenville, NC 27858

SEE ATTACHED MAILING MATRIX FOR LISTING OF CREDITORS

by depositing said document in the United States Mail, postage prepaid. I certify under penalty of perjury that this foregoing is true and correct.

Executed: December 9, 2015

BY:/s/Allen C. Brown  
Allen C. Brown  
Attorney for Debtor(s)  
3493-C S. Evans St.  
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Greenville, NC 27835  
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State Bar #: 12131

Label Matrix for local noticing  
0417-5  
Case 14-04412-5-SWH  
Eastern District of North Carolina  
Raleigh  
Tue Nov 10 11:32:47 EST 2015

Bankruptcy Administrator  
Two Hannover Square, Ste. 640  
434 Fayetteville Street  
Raleigh, NC 27601-1701

Alabama Credit dba Preferred Teachers  
c/o Kirschbaum, Nanney, Keenan & Gr  
PO Box 19806  
Raleigh NC 27619-9806

Alabama Credit dba Preferred Teachers  
c/o Kirschbaum, Nanney, Keenan & Griffin  
PO Box 19806  
Raleigh, NC 27619-9806

Teresa P Battle  
211 Adams Blvd  
Greenville, NC 27858-4818

Allen C Brown  
Allen C. Brown, PA  
PO Drawer 1909  
Winterville, NC 28590-1909

Cavalry Portfolio Serv  
Po Box 27288  
Tempe, AZ 85285-7288

Financial Data Systems  
1638 Military Cutoff Rd  
Wilmington, NC 28403-5716

(c)GREEN TREE SERVICING L  
332 MINNESOTA ST STE E610  
SAINT PAUL MN 55101-1311

(p)GREENTREE SERVICING LLC  
BANKRUPTCY DEPARTMENT  
P O BOX 6154  
RAPID CITY SD 57709-6154

IRS  
Kelvin Guthrie  
4905 Koger Blvd  
Suite 102, M/S 9  
Greensboro, NC 27407-2734

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

IRS  
PO BOX 7346  
Philadelphia, PA 19101-7346

IRS Insolvency new  
2303 Meadowview Rd.  
mail stop 9  
Greensboro, NC 27407-3701

Interntl  
Po Box 7955  
Mobile, AL 36670-0955

MARINER FINANCE NORTH CAROLINA, INC  
F/K/A SECURITY FINANCE CORPORATION  
8211 TOWN CENTER DRIVE  
NOTTINGHAM, MD 21236-5904

NC Department of Revenue  
PO Box 25000  
Raleigh, NC 27626-5000

NCDR  
PO Box 1168  
Raleigh, NC 27602-1168

David P. Nanney Jr.  
Kirschbaum, Nanney, Keenan & Griffin, PA  
PO Box 19766  
Raleigh, NC 27619-9766

Pamela P. Keenan  
PO Box 19806  
Raleigh, NC 27619-9806

Santander Consumer USA, Inc.  
Po Box 560284  
Dallas, TX 75356-0284

Santander Consumer Usa  
Po Box 961245  
Ft Worth, TX 76161-0244

Sca Collections Inc  
Po Box 876  
Greenville, NC 27835-0876

Richard M Stearns  
1015 Conference Drive  
Greenville, NC 27858-5969

Williamsburg Plantation  
3015 North Ocean Blvd  
Suite 121  
Fort Lauderdale, FL 33308-7344

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Green Tree Servicing, LLC  
P.O. Box 6154  
Rapid City, SD 57709-6154  
Telephone number: 888-298-7785

IRS  
320 Federal Place Rm 335  
Greensboro, NC 27401

(d) IRS  
PO Box 21126  
Philadelphia, PA 19114

(d) Internal Revenue Service  
Insolvency Support Services  
320 Federal Place, Room 335  
Greensboro, NC 27401

Addresses marked (c) above for the following entity/entities were corrected  
as required by the USPS Locatable Address Conversion System (LACS).

Green Tree Servicing L  
332 Minnesota St Ste 610  
Saint Paul, MN 55101

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Alabama Credit Corporation dba Preferred T	End of Label Matrix
	Mailable recipients 24
	Bypassed recipients 1
	Total 25